

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 1596, 1597

**SUPPLEMENTAL DECLARATION OF DEMETRIOS FIFIS IN SUPPORT OF
MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) AUTHORIZING AND
APPROVING SALE OF DEBTORS' INTERESTS IN SCHF CAYMAN, L.P. FREE AND
CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES;
(II) AUTHORIZING AND APPROVING DEBTORS' ENTRY INTO, AND
PERFORMANCE UNDER, THE PURCHASE AND SALE AGREEMENT;
(III) AUTHORIZING AND APPROVING ASSUMPTION AND ASSIGNMENT OF
CERTAIN CONTRACTS AND (IV) GRANTING RELATED RELIEF**

I, Demetrios Fifis, hereby declare as follows:

1. I am a Vice President of Liberty Mutual Investments Holdings LLC, a Delaware limited liability company ("Purchaser").
2. I have held my Vice President position at Purchaser since January 1, 2019, prior to that I was an Assistant Vice President, first elected on February 15, 2016.
3. On June 8, 2023, I submitted a declaration [D.I. 1597] in support of the *Motion of Debtors for Entry of an Order (i) Authorizing and Approving Sale of Debtors' Interests in SCHF Cayman, L.P. Free and Clear of All Liens, Claims, Interests and Encumbrances; (ii) Authorizing and Approving Debtors' Entry into, and Performance Under,*

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

the Purchase and Sale Agreement; (iii) Authorizing and Approving Assumption and Assignment of Certain Contracts; and (iv) Granting Related Relief [D.I. 1596] (the “Motion”).² I now submit this supplemental declaration in further support of the Motion.

4. Upon reviewing the applicable records of Purchaser, I believe that Purchaser is not an “insider” of the Debtors, as that term is defined in section 101(31) of the Bankruptcy Code.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: June 26, 2023.



Demetrios Fifis
Vice President
Liberty Mutual Investments Holdings LLC

² Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Motion.